

# **Exhibit 2**

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August 13, 2010

The Honorable Viktor Pohorelsky  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

### By Electronic Case Filing

Re: *In re Air Cargo Shipping Services Antitrust Litigation*, 06-MD-1775 (JG) (VVP)

Dear Magistrate Judge Pohorelsky:

With the consent of Plaintiffs, the undersigned Defendants move the Court pursuant to Local Rule 37.3 for an order setting a briefing schedule and extending the Court's page limitations in connection with a motion to compel that Defendants are filing today (the "Motion to Compel"). The Motion to Compel raises important and complex legal issues concerning the scope of discovery in this case that cannot be adequately described within this Court's ordinary page limitations. In particular, the Motion raises the question of whether Plaintiffs should be compelled to produce documents concerning their freight forwarding businesses, where such documents are relevant to numerous issues in this action. Approximately fifteen of Defendants' document requests are at issue in the dispute to be briefed.

After consultations with Plaintiffs, and with Plaintiffs' consent, Defendants propose the following briefing schedule for their Motion to Compel:

- Defendants will file their letter motion (not to exceed ten pages) on Friday, August 13, 2010;
- Plaintiffs will file their letter in opposition (not to exceed ten pages) by Friday August 27, 2010.

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Defendants will respectfully ask the Court to consider addressing this motion at the upcoming September 15, 2010 Status Conference.

Respectfully submitted,

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